



## **GE Consumer & Industrial**

*Environmental, Health & Safety  
Appliance Park, AP26-100, Louisville, KY 40225*

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Hand Delivered

November 22, 2004

Mr. Art Williams  
Louisville Metro Air Pollution Control District  
850 Barret Avenue  
Louisville, KY 40204

RE: Comments on Draft STAR Program

Dear Mr. Williams:

GE appreciates the opportunity to meet with you about the draft STAR program and to share with you with our concerns. GE understands that the air-toxics monitoring study has shown that there is an issue in some areas of Metro Louisville and that a program is necessary to address these issues. GE applauds your efforts to develop a program to address these complicated issues in a difficult environment.

GE also commends you for starting a stakeholder communication program and especially appreciates the meeting that you had with us yesterday. GE encourages you to continue this process until the regulations are finalized.

As we discussed, there are several areas of the program that cause us concern. This letter summarizes what we believe are the adverse impacts on GE we have identified so far and outlines some recommendations for improvements.

### **Impact to GE**

GE has conducted modeling using the draft APCD regulation Tier 3 modeling with the EPA SCREEN 3 model and its best understanding of the modeling protocols required by STAR. GE is continuing to examine the impact of the regulations on its operations and may identify additional operations that are impacted, but has identified two critical operations where the regulations will likely require curtailment of operations.

- *Plastics Operations* – GE extrudes and molds ABS plastics to form liners for the inside of refrigerators. Results from modeling emissions from these operations tell us that the STAR regulations as drafted would require GE to discontinue them, causing a severe impact on refrigerator production and associated jobs.
- *Building and Process Heating* – GE currently uses a combination of a landfill-gas boiler and coal-fired boilers to produce steam for processes and building heat. The Federal Boiler NESHAP will regulate emissions from the boilers starting in 2007. GE has planned to comply with the Federal rules by switching to natural gas, which is considered by EPA

to be the preferred method of controlling toxic emissions from process and space heating. GE is currently planning to switch to a distributed natural gas system for building heat and retaining the landfill gas boiler for process steam.

Results from modeling emissions from natural gas combustion tell us even with a switch from coal to natural gas we will not meet the proposed District standards. As a result Appliance Park's ability to generate process steam and building heat will be severely curtailed.

## **Recommendations for improvements to the program**

### **STAR should have exemptions for operations with *de minimis* emissions.**

The STAR program as currently drafted applies to any operation that emits any amount of a listed chemical.<sup>1</sup> This includes operations that are exempt from permitting or are considered insignificant by the Title V program. GE urges the District to provide appropriate exemptions for operations that have minimal emissions and pose minimal risk.

The Michigan Air Toxic rules apply only to new and modified emission units for which an application for a permit to install is required and emit a toxic air contaminant. And for those sources, Michigan's rules exempt numerous operations with very small emissions, including:

- ◆ Gas or oil-fired furnaces, ovens, and heaters <10 MM Btu/hour;
- ◆ Plastic extrusion, injection, and compression processes;
- ◆ Emission units with limited emissions.

GE recognizes that Louisville may not want to exempt all existing sources. But exemptions should be available for selected operations with few emissions and low risk. For these reasons, GE urges the District to amend section 4.2 of draft Regulation 5.01 to include the exemptions listed above and to amend sections 4.1.1 and 4.1.2 to additionally exempt the following:

- ◆ Trivial activities as recognized by U.S. EPA (see <http://www.air.ky.gov/permitting/Trivial+Activities.htm>),
- ◆ Insignificant activities as defined by Regulation 2.16, section 1.22, or
- ◆ Any other operation specifically exempt from permitting requirements as listed in Section 2 or Regulation 2.02.

Alternately, the District could specifically add the same exemptions found in the Michigan program at R 336.1280 – R 336.1290.

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<sup>1</sup> As we pointed out in our October 7, 2004, comments, the program will regulate even printer ink and cans of spray paint. Our objective in mentioning these items was to demonstrate what we assumed was the *unintended* breadth of the program and emphasizes the need for *de minimis* exemptions.

Again, we thank you for considering these and other concerns we have articulated in our previous comments as you consider how to revise STAR.

Sincerely,

Steven Marks  
GE Consumer & Industrial  
Global Air Programs